

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	Criminal No. 25cr10074
	)	
v.	)	Violation:
	)	
ROBERT CAMPBELL,	)	<u>Count One:</u> Felon in Possession of
	)	Firearm and Ammunition
Defendant	)	(18 U.S.C. § 922(g)(1))
	)	
	)	<u>Forfeiture Allegation:</u>
	)	(18 U.S.C. § 924(d); 28 U.S.C. § 2461(c))

INDICTMENT

COUNT ONE

Felon in Possession of Firearm and Ammunition  
(18 U.S.C. § 922(g)(1))

The Grand Jury charges:

On or about January 28, 2025, in Dorchester, in the District of Massachusetts, the defendant,

ROBERT CAMPBELL,

knowing that he was previously convicted in a court of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting commerce, a firearm and ammunition, that is, a Glock 32, .357 caliber handgun bearing serial number NGG743, 14 rounds of .357 caliber ammunition, 40 rounds of .45 caliber ammunition, and 75 rounds of 9mm ammunition.

All in violation of Title 18, United States Code, Section 922(g)(1).

FIREARM FORFEITURE ALLEGATION  
(18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c))

The Grand Jury further finds:

1. Upon conviction of the offense in violation of Title 18, United States Code, Section 922(g)(1), set forth in Count One, the defendant,

ROBERT CAMPBELL,

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c), any firearm or ammunition involved in or used in any knowing commission of the offense. The property to be forfeited includes, but is not limited to, the following:

- a. Glock 32, .357 caliber handgun (Serial Number: NGG743);
- b. 14 rounds of .357 caliber ammunition;
- c. 40 rounds of .45 caliber ammunition; and
- d. 75 rounds of 9mm ammunition.

2. If any of the property described in Paragraph 1, above, as being forfeitable pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c), as a result of any act or omission of the defendant --


- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described in Paragraph 1 above.

All pursuant to Title 18, United States Code, Section 924, and Title 28, United States Code, Section 2461.

A TRUE BILL

  
FOREPERSON

  
\_\_\_\_\_  
ALLEGRA FLAMM  
MARK GRADY  
ASSISTANT UNITED STATES ATTORNEYS  
DISTRICT OF MASSACHUSETTS

District of Massachusetts: FEBRUARY 27, 2025  
Returned into the District Court by the Grand Jurors and filed.

/s/ Noreen A. Russo  
\_\_\_\_\_  
DEPUTY CLERK at 1:12 PM